VS.

COLUMBIA STATE BANK, a Wisconsin corporation,

Defendant.

Case No.: 2:14-CV-287

DECLARATION OF CHAD **FREEBOURN** 

I, Chad Freebourn, under penalty of perjury under the laws of the State of Washington, declare and state as follows:

- I am over the age of 18 and competent to be a witness herein. 1.
- I am the attorney of record for Plaintiff Greg Partch, in the above-2. captioned case and make the statements contained in this declaration on personal knowledge.
- Attached hereto as "Exhibit A" is a true and correct copy of a letter 3. that I emailed to Bob Dunn on January 05,2017.

Declaration of Chad Freebourn

ROBERTS | FREEBOURN, PLLC 1325 W. 1st Ave., Ste.303 Spokane, WA 99201 (509) 381-5262

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- 4. Attached hereto as "Exhibit B" is the January 5, 2017 email attaching the January 5, 2016, letter to Mr. Dunn.
- 5. The letter contains a typo indicating the date as January 5, 2016. The letter was written was written and sent on January 5, 2017.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 16<sup>th</sup> day of February, 2018.

/s/Chad Freebourn

Chad Freebourn WSBA # 35624 Attorney for Plaintiff Roberts Freebourn, PLLC 1325 W. 1<sup>st</sup> Ave., Ste. 303 Spokane, WA 99201

Telephone: (509) 381-5262 Facsimile: (509) 473-9026

Email: Chad@robertsfreebourn.com

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16<sup>th</sup> day of February, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send notification of such filings to the following:

/s/Chad Freebourn
Chad Freebourn WSBA # 35624
Attorney for Plaintiff
Roberts Freebourn, PLLC
1325 W. 1<sup>st</sup> Ave., Ste. 303
Spokane, WA 99201

Telephone: (509) 381-5262 Facsimile: (509) 473-9026

Email: Chad@robertsfreebourn.com

Declaration of Chad Freebourn

ROBERTS | FREEBOURN, PLLC 1325 W. 1<sup>st</sup> Ave., Ste.303 Spokane, WA 99201 (509) 381-5262

Exhibit A



## ROBERTS | FREEBOURN, PLLC

313 W. Riverside Ave | Spokane, WA 99201 Phone: (509) 381-5262 | Facsimile: (509) 473-9026 \*\*Kevin W. Roberts Chad Freebourn \*Chris Cox Victoria M. Johnston

\*\*Admitted in WA, OR, ID &MT \*Admitted in WA & ID

January 5, 2016

Robert A. Dunn Dunn & Black, P.S. 111 N. Post St., Ste. 300 Spokane, WA 99201

Re: Partch v. Columbia Bank

Dear Mr. Dunn:

Our client Greg Partch made us aware of your December 29, 2016, letter regarding an "outstanding account." Please be advised that Kevin Roberts represents Mr. Partch regarding this matter, and all correspondence and communication needs to be directed through our office. Mr. Roberts is out of town for a family emergency in Montana, and is presently unavailable to address this matter. You should be aware that Columbia Bank's counsel has been directed by the Court to deposit the funds you are referring to in your letter into the registry of the court so that the judge can determine the validity of the lien.

Please confirm that you will not submit Mr. Partch to collections, as it will cause our client additional and unnecessary damages related to the disputed attorney lien.

ROBERTS | FREEBOURN, PLLC

Chad Freebourn

Exhibit B

From: Chad Freebourn chad@robertsfreebourn.com

Subject: Partch v. Columbia Bank Date: January 5, 2017 at 11:42 AM

To: Bob Dunn bdunn@dunnandblack.com

Cc: gpartchjr@comcast.net

Mr. Dunn,

Please see the letter attached below.

Chad Freebourn Roberts I Freebourn, PLLC 313 W. Riverside Avenue Spokane, WA 99201 509-381-5262 chad@robertsfreebourn.com



## ROBERTS | FREEBOURN, PLLC

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Please confirm that you will not submit Mr. Partch to collections, as it will cause our client additional and unnecessary damages related to the disputed attorney lien.

Very fally yours.
Chad Freebourn